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**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH**

IN RE MYRIAD GENETICS, INC.
SECURITIES LITIGATION

Civ. A. No. 2:19-cv-00707-DBB-DBP

Judge David B. Barlow

Magistrate Judge Dustin B. Pead

**DECLARATION OF ABE ALEXANDER IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL FORMER MYRIAD EMPLOYEE PAUL
PARKINSON TO COMPLY WITH LEAD PLAINTIFF'S DOCUMENT SUBPOENA**

I, ABE ALEXANDER, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am a Partner of the law firm of Bernstein Litowitz Berger & Grossmann LLP and have been admitted to this Court *pro hac vice*. I have personal knowledge of the facts set forth

herein. If called as a witness, I could competently testify to the matters set forth herein.

2. Attached as Exhibit A is a true and correct copy of the subpoena for testimony and the production of documents issued to Paul “Chip” Parkinson on July 12, 2022.

3. Attached as Exhibit B is a true and correct copy of Parkinson’s Objections to Plaintiff’s Subpoena for the Production of Documents, dated July 22, 2022.

4. Attached as Exhibit C is a true and correct copy of an excerpt of the transcript of Parkinson’s deposition, dated July 26, 2022.

5. Mr. Parkinson’s counsel O’Melveny & Myers (“OMM”) has informed counsel for Plaintiff that it represents at least five former Myriad employees. On August 15, 2022, I participated in a meet and confer with OMM in connection with subpoenas ad testificandum and duces tecum issued to Mr. Michael Jablonski, another former Myriad employee. Like the subpoenas issued to Mr. Parkinson, the subpoenas issued to Mr. Jablonski call for production of communications concerning this litigation between Mr. Jablonski or his counsel on the one hand, and Myriad or its counsel, on the other. OMM informed me that its clients had not executed a written joint defense agreement with any Defendant in this case. Further, I asked OMM to identify the common legal interests Mr. Jablonski shares with the Defendants. OMM replied that Mr. Jablonski shares a common legal interest with the Defendants because he “disagrees with the allegations of the Complaint.” I further asked Mr. Jablonski’s counsel whether it was their position that Plaintiff should seek the discovery sought from Myriad, rather than Mr. Jablonski; they replied that it was.

This declaration is executed in New York, New York on August 15, 2022, under penalty of perjury pursuant to the laws of the United States.

/s/ Abe Alexander

Abe Alexander